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Questions and answers: Good manufacturing practice

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This page lists the European Medicines Agency's answers to frequently asked questions, as discussed and agreed by the Good Manufacturing Practice (GMP) / Good Distribution Practice (GDP) Inspectors Working Group.

Further questions and answers are published as the need arises. Individual questions and answers may be removed when the relevant GMP guidelines are updated.

Code

- ▶ H: applicable to human medicines
- ▶ V: applicable to veterinary medicines

Table of contents

- ▶ [European Union \(EU\) GMP guide part I: Basic requirements for medicinal products: Chapter 3: Equipment](#)
- ▶ [European Union \(EU\) GMP guide part I: Basic requirements for medicinal products: Chapter 5: Qualification of suppliers](#)
- ▶ [EU GMP guide part II: Basic requirements for active substances used as starting materials: GMP compliance for active substances](#)
- ▶ [EU GMP guide part II: Basic requirements for active substances used as starting materials: GMP compliance for active substances in investigational medicinal products \(IMPs\)](#)
- ▶ [EU GMP guide annexes: Supplementary requirements: Annex 1: Manufacture of sterile medicinal products](#)
- ▶ [EU GMP guide annexes: Supplementary requirements: Annex 6: Manufacture of medicinal gases](#)
- ▶ [EU GMP guide annexes: Supplementary requirements: Annex 8: Sampling of starting and packaging materials: Glycerol](#)
- ▶ [EU GMP guide annexes: Supplementary requirements: Annex 8: Sampling of starting and packaging materials: Use of near-infrared \(NIR\) technology for container-wise identity testing](#)
- ▶ [EU GMP guide annexes: Supplementary requirements: Annex 11: Computerised systems](#)
- ▶ [EU GMP guide annexes: Supplementary requirements: Annex 13](#)
- ▶ [EU GMP guide annexes: Supplementary requirements: Annex 16](#)
- ▶ [EU GMP guide annexes: Supplementary requirements: Annex 19: Reference and retention samples \(Updated\)](#)
- ▶ [General GMP](#)
- ▶ [GMP certificates](#)
- ▶ [Inspection coordination](#)
- ▶ [Related links](#)

European Union (EU) GMP guide part I: Basic requirements for medicinal products: Chapter 3: Equipment

[Back to top ▲](#)[Expand all items in this list](#)

- 1. [Should metal detectors be used routinely in manufacturing processes for certain dosage forms e.g. tablet compression and encapsulation processes? H+V February 2015](#)

European Union (EU) GMP guide part I: Basic requirements for medicinal products: Chapter 5: Qualification of suppliers

[Back to top ▲](#)[Expand all items in this list](#)

- 1. [Is an audit performed by a third party acceptable? H+V July 2006](#)
- 2. [Is it possible to use multiple batch numbers in packaging of medicinal products? H+V January 2005](#)
- 3. [What are the expectations with regard to documentation and verification of the supply chain for active substances \(ref. Paragraph 5.29, Chapter 5 EU GMP Guide\)? H+V August 2015](#)

The supply chain for each active substance must be established back to the manufacture of the active substance starting materials. This should be documented and must be kept current. The risks associated with this supply chain should be formally documented. Control of each incoming consignment of active substance should include verification that it has been received from the approved supplier and approved manufacturer. The entire supply chain should be verified for a supplied batch periodically to establish a documented trail for the batch back to the manufacturer(s) of the active substance starting materials. The frequency of this verification should be based on risk.

Mutual Recognition Agreements

Falsified medicines

Quality by design

Product defects and recalls

Parallel distribution

Medicine shortages

Antimicrobial resistance

Pandemic influenza

New countries/EFTA

Non-pharmaceutical products

Fees

Medicines and emerging science

Adaptive pathways

Biological and chemical agents

Ebola

EU GMP guide part II: Basic requirements for active substances used as starting materials: GMP compliance for active substances

[Back to top ▲](#)

► [Expand all items in this list](#)

1. [How can GMP compliance for active-substance manufacturers be demonstrated? H+V April 2011](#)
2. [Do I need to perform an audit of an active substance supplier if it has been inspected by an inspectorate from a European Economic Area \(EEA\) Member State and a valid GMP certificate is available? H+V July 2006](#)
3. [Is it acceptable to perform a remote assessment based on, for example, questionnaires, review of documents, International Organization for Standardization 9000 certification, results of analytical testing and historical experience with the supplier? H+V July 2006](#)
4. [How do the new requirements affect importers of medicinal products? H+V July 2006](#)
5. [Is it possible to ask for a voluntary inspection of an active substance manufacturer? H+V February 2015](#)
6. [The notice to applicants requires the submission of a declaration signed by the qualified person \(QP\) that the active substance used is manufactured in accordance with GMP. The active substance in my product is widely used, but not normally as a pharmaceutical active substance, and I am having some difficulty in confirming compliance. What should I do to furnish the required declaration? H+V September 2008](#)
7. [What kind of GMP documentation is needed for an active-substance manufacturer that performs sterilisation of an active substance? July 2010](#)
8. [During inspections, why do inspectors sometimes ask to see reports of audits of active substance manufacturers carried out by the medicinal product manufacturer? H+V May 2013](#)
9. [What expectations do inspectors have for the content of reports of audits of active substance manufacturers carried out by the medicinal-product manufacturer? H+V May 2013](#)
10. [How should active substance auditors be qualified? H + V May 2013](#)
11. [What is the frequency for the routine re-inspection of an active substance manufacturer? H+V February 2015](#)

EU GMP guide part II: Basic requirements for active substances used as starting materials: GMP compliance for active substances in investigational medicinal products (IMPs)

[Back to top ▲](#)

► [Expand all items in this list](#)

1. [Are active substances used as starting materials in the production of IMPs subject to GMP? H July 2006](#)

EU GMP guide annexes: Supplementary requirements: Annex 1: Manufacture of sterile medicinal products

[Back to top ▲](#)

► [Expand all items in this list](#)

1. [How should the integrity of sterilising filters be verified? H+V June 2007](#)
2. [What are the sampling requirements for sterility testing when a finished product batch of a terminally sterilised medicinal product is made up of more than one steriliser load? H+V October 2008](#)
3. [What are the key changes in the 2008 revision of annex 1 of the EU GMP? H+V January 2010](#)
4. [The new revision to the annex includes a number of revised requirements. What steps are being taken by EU authorities to assure the consistent interpretation of the requirements of the revised annex by EU GMP inspectors during inspections? H+V January 2010](#)
5. [For an aseptically produced product, where should bioburden monitoring take place? H+V May 2013](#)
6. [What is the maximum acceptable bioburden level? H+V May 2013](#)

EU GMP guide annexes: Supplementary requirements: Annex 6: Manufacture of medicinal gases

[Back to top ▲](#)

► [Expand all items in this list](#)

1. [What is traceability? H+V July 2010](#)
2. [Which items should be recorded in the case of medicinal gases filled into cylinders to enable traceability? H+V July 2010](#)
3. [What means should be implemented to ensure traceability? H+V July 2010](#)
4. [What should be possible through the system of traceability? H+V July 2010](#)

EU GMP guide annexes: Supplementary requirements: Annex 8: Sampling of starting and packaging materials: Glycerol

[Back to top ▲](#)

► [Expand all items in this list](#)

1. [What is the background regarding international incidents of glycerol contamination? H+V December 2007](#)
2. [How is the EU patient protected from similar contamination occurring in EU products? H+V December 2007](#)

■

- [+](#) 3. Annex 8 of the GMP provides for derogations from the requirement for identity testing of every container where there is a validated supply chain. Can I use this derogation for the glycerol I purchase? H+V December 2007
- [+](#) 4. What steps are expected of manufacturers based in the EU when purchasing glycerol or of manufacturers based in third countries supplying glycerol-containing medicines? H+V December 2007
- [+](#) 5. The European Pharmacopoeia limit test for DEG involves a gas chromatographic method, which may be difficult to perform on a large number of containers. H+V December 2007
- [+](#) 6. Are there any considerations applicable to the pharmaceutical assessment of marketing-authorisation applications? H+V July 2008
- [+](#) 7. My company manufactures products for external use. Does this guidance apply? H+V July 2008

EU GMP guide annexes: Supplementary requirements: Annex 8: Sampling of starting and packaging materials: Use of near-infrared (NIR) technology for container-wise identity testing

[Back to top ▲](#)

▶ Expand all items in this list

- [+](#) 1. The registered specifications of our starting materials include conventional or pharmacopoeial methods for the confirmation of identity but we wish to use NIR to perform identity testing on each container of starting materials used in the manufacture of parenteral products. Is the use of this alternative method acceptable?

EU GMP guide annexes: Supplementary requirements: Annex 11: Computerised systems

[Back to top ▲](#)

▶ Expand all items in this list

- [+](#) 1. Appropriate controls for electronic documents such as templates should be implemented. Are there any specific requirements for templates of spreadsheets? H+V February 2011
- [+](#) 2. What type of accuracy checks (annex 11 p 6) are expected for the use of spreadsheets? H+V February 2011
- [+](#) 3. Are there any specific considerations for the validation of spreadsheets? H+V February 2011
- [+](#) 4. What measures are required to ensure data security of databases? H+V February 2011
- [+](#) 5. At which phases of the system life-cycle is risk management recommended? H+V February 2011
- [+](#) 6. Are user requirements needed as part of the retrospective validation of legacy systems? H+V February 2011
- [+](#) 7. When do I have to revalidate computerised systems? H+V February 2011
- [+](#) 8. What are the requirements for storage time of electronic data and documents? H+V February 2011
- [+](#) 9. What are the relevant validation efforts for small devices? H+V February 2011
- [+](#) 10. What alternative controls are accepted in case a system is not capable to generate printouts indicating if any of the data has been changed since the original entry? H+V February 2011

EU GMP guide annexes: Supplementary requirements: Annex 13

[Back to top ▲](#)

▶ Expand all items in this list

- [+](#) 1. At what point of processing or incorporation would an active substance be considered a product intermediate and therefore an IMP? H June 2007
- [+](#) 2. How can the QP of a site assure compliance with the requirements of the clinical-trial application in situations where a QP may be required to certify a batch before the application is submitted to, or accepted by, the competent authority? H June 2007
- [+](#) 3. Is it possible to perform packaging or labelling at the investigator site? H September 2007
- [+](#) 4. Who is responsible for the packaging or labelling activities carried out at the investigator site? H September 2007
- [+](#) 5. Who is responsible for the transport and storage conditions when an IMP is transported from the manufacturer to the distributor or investigator sites? H May 2009
- [+](#) 6. What measures should be taken to ensure that the IMPs are kept under suitable conditions during transportation between the manufacturer or distributor and the investigator sites? H May 2009
- [+](#) 7. What measures should be taken to ensure that IMPs are kept under suitable conditions during storage at the investigator sites? H May 2009
- [+](#) 8. What written procedures should be in place at the investigator site regarding IMPs? H May 2009
- [+](#) 9. What records must be kept at the investigator site regarding the abovementioned procedures? H May 2009

EU GMP guide annexes: Supplementary requirements: Annex 16

[Back to top ▲](#)

▶ Expand all items in this list

- [+](#) 1. Can a site have more than one QP performing certification of batches?
- [+](#) 2. Can there be more than one QP involved in the certification of a given batch?

EU GMP guide annexes: Supplementary requirements: Annex 19: Reference and retention samples (Updated)

[Back to top ▲](#)[▶ Expand all items in this list](#)

- +** 1. **Is it necessary to retain a sufficient number of samples of each batch of a sterile medicinal product in order to carry out a sterility test on two separate occasions?** H+V October 2008
- +** 2. **In which cases does the exemption for a fully packaged unit as retention sample apply as referred to in section 2.1 of EU GMP Part I, annex 19: "There may be exceptional circumstances where this requirement can be met without retention of duplicate samples e.g. where small amounts of a batch are packaged for different markets or in the production of very expensive medicinal products"?** H+V December 2013
- +** 3. **In those cases where the supervisory authority agrees that the criteria mentioned in the answer to question 1 are met, what should be retained instead of a fully packaged unit?** H+V December 2013
- +** 4. **Do different requirements for reference and retention samples apply for some medicinal products?** H+V December 2013

General GMP

[Back to top ▲](#)[▶ Expand all items in this list](#)

- +** 1. **What are the differences between EU and World Health Organization (WHO) requirements for GMP?** H July 2006

GMP certificates

[Back to top ▲](#)[▶ Expand all items in this list](#)

- +** 1. **What is a GMP certificate and what is the difference between GMP certificates, certificates of medicinal product (CMPs, also called certificates of pharmaceutical products, CPPs) and certificates of suitability to the monographs of the European Pharmacopoeia (CEPs)?** H+V July 2006
- +** 2. **Does the Agency issue GMP certificates?** H+V July 2006
- +** 3. **Which EU and EEA authorities conduct mutually recognised inspections and issue GMP certificates?** H+V November 2011

Inspection coordination

[Back to top ▲](#)[▶ Expand all items in this list](#)


- +** 1. **Does the Agency perform GMP inspections?** H+V July 2006
- +** 2. **If a site in a third country has plans to export products to the EEA, is it possible to apply for a GMP inspection on a voluntary basis?** H+V July 2006
- +** 3. **When a new application is submitted in the EEA and a GMP inspection is deemed necessary, which competent authority carries out the inspection?** H+V July 2006

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[Back to top ▲](#)[▶ Expand all items in this list](#)

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